

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Modernization of Media Regulation

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) **MB Docket No. 17-105**
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COMMENTS

By Edward A. Schober, PE

1. Edward A. Schober, is a licensed professional engineer employed by Radiotechniques Engineering LLC, a New Jersey limited liability company that provides engineering services to broadcasting stations. He has engineered hundreds of AM station upgrades, modifications and applications for new stations. He is also a member in Winchester Radio Broadcasters, LLC, owner of WXVA(AM), Winchester, VA, and is an owner of Zip2, LLC the licensee of WKGE(AM), Johnstown, PA and an applicant for a new AM station in Enola, PA. He is also the licensee and permittee of several FM Translators. Mr. Schober has over thirty-five years experience in advising broadcast radio station clients in areas of RF engineering, station design, FCC technical representation and propagation studies. Mr Schober is a member of the AFCCE, and a senior life member of the IEEE and senior member of the SBE. Mr Schober's contact information is:

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2) Mr Schober had intended to provide comprehensive comments for all of part 73 and 74 Broadcast Regulations with full comments on each. The exigencies of business operations have limited this to a summary and touching on many areas that should be considered for deletion or modification.

These are the items I have identified, and propose the Commisison consider deleting. This list is certainly not comprehensive, as with all things human, regulation comes with accumulating cruft. Much of this is regulation which may have been important at some time, which was left over when rules were consolidated into other parts, and when technology changed.

Regulation	Comment
-----AM Regulations -----	
73.30	Obsolete Regulation – No new allocations will be made according to this rule, propose to regulate as conventional class B stations
73.35	Obsolete Regulation
73.44(e)	Remove section, analog modulation has not caused insignificant adjacent channel interference in comparison with AM HD transmission systems.
73.51(b)(3)(ii)	Delete – Obsolete regulation
73.54(c) and (d)	Delete - Unnecessary FCC notification
73.62(d)	Delete - Duplicate of 73.69(b)
73.69(d)	Delete - Overly Proscriptive
73.69(e)	Delete – Authorized antenna monitors are not field calibrated.
73.99	I had previously proposed for complete overhaul as a petition.
73.127(b)	Delete – These services correspond with FM SCA services which are not so regulated.
-----FM Regulations -----	
73.205	Recommend deleting FM zones, grandfather class B and B1 stations. Allocations changes beyond scope of this rulemaking.
73.211(d)	Obsolete regulation
73.239	Delete, or consolidate with TV and AM in a 73.1600 series regulation.
73.258	Delete - Unduly Proscriptive – These specifications are for approval of transmitters, should be In Part 2 if required, not operation of stations.
73.312	Delete or modify - Obsolete methodology. HAAT has been calculated using much more accurate methods using topographic databases.
73.313(d)	Delete or modify – obsolete methodology
73.314	Delete
73.315 (b)	Unduly proscriptive

73.315(c)	Delete – Class A stations in large markets cannot meet this regulation
73.315(d)	Delete – obsolete methodology
73.315(e)	Delete – Subject to Antenna Registration and FAA regulations
73.316(a)	Delete – Obsolete
73.525	Delete – Obsolete (The standards of this rule have no relationship to actual interference to digital TV stations) There may be a requirement to protect Channel 6 Digital TV stations, but there is no science that these limits are within an order of magnitude of actual interference. The service contour of Channel 6 TV stations does not correspond with the FCC rules, as many Channel 6 TV stations operate with substantially greater power than the rules contemplate, as signal levels required for acceptable over the air reception are much greater than provided in the rules. I recommend that the rules simply require that NCE FM stations are required to provide filters or otherwise resolve all TV 6 interference complaints which can be determined to actually result from an NCE FM operation.
73.558	Delete – Proscriptive and obsolete.
----- International Broadcast Stations	
73.713	Simplify – Program tests should be permitted upon filing of License Application.
-----Common Regulations	
73.1620(a)	Simplify – Broadcast stations should be permitted to commence program tests upon filing an application for station license. In the case of errors or omissions in the license application, they must be corrected within 30 days of notification by the FCC of such errors or omission, otherwise Program tests must be suspended. This regulation causes stations with directional antennas to be severely financially impacted by delay in beginning of operations.
73.1620(g)	Delete – Obsolete
73.1665(b)	Delete – Obsolete
73.1870(b)(i) and (ii)	Delete – and append (iii) as a continuation of (b)
73.1942(a)	Revise to delete minimum unit rate. Provide for a uniform rate for all candidates without respect to commercial rates charged for non candidate customers. As long as all candidates must pay a uniform rate, there is no justification for low rates for politicians.
73.1943	The Political file should be part of the FCC public file using a standard format for all stations: Rates, Requests for time, any special considerations concerning

preemptable time, etc. The station would simply enter the required data in the file.

73.2080 Simplify EEO compliance. It should be similar to requirements for other industries, such as for government contracting. Stations with more than 5 and less than, say 25 full time employees should have a simplified set of standards.

73.3612, 73.3613,
73.3615 Eliminate these rules: These items are required to be maintained in the station's web public file. No separate filings should be required. The FCC staff may access this information in a single consolidated location. The web software can automatically notify FCC staff of updates upon upload so no periodic update schedule is required.

----- Auxiliary Services -----

Remote Pickup

74.431(a), (b),(c), (h) Delete
74.431(f) Remove words "in Alaska, Guam, Hawaii, Puerto Rico, and the Virgin Islands:

FM Translators

74.1203 This section needs to be re-worked, as the interference complaint procedure is fraught with deceptive practices. The area where FM station listeners should be limited to a specific F(50,50) contour, I propose 54 or perhaps 50 dbu. Outside that area a full service station is not expected to be protected from interference from an FM translator. Intermittent weather related interference should not be considered. Full service stations have hosted outside broadcasting from well outside their service area and used internet streaming to give listeners the impression that the signal was over the air when they solicit complaints. Stations have solicited complaints on their internet stream which imply that by complaining they might be able to receive over the air the signals they currently receive only on the internet stream.

3. 11) These comments are based upon reflection on what can be done to simplify broadcast regulation, while recognizing the requirement to regulate the operation of stations to assure that they operate with the public interest. These proposals are pragmatic, and work in an engineering environment.

Respectfully Submitted,



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